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February 16, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: GN Docket No. 16-142

Dear Ms. Dortch:

On February 14, 2017, Rick Chessen, Diane Burstein, and Andy Scott, of NCTA - The Internet and Television Association (“NCTA”), met with Alison Nemeth, Acting Media Advisor for Chairman Pai, and with David Grossman, Chief of Staff and Media Policy Advisor to Commissioner Clyburn, and on February 15, 2017, with Robin Colwell, Chief of Staff and Senior Legal Advisor to Commissioner O’Rielly, to discuss the draft Notice of Proposed Rulemaking in the above-captioned proceeding.

At the meetings, consistent with our written comments in this proceeding, NCTA explained that we do not oppose the broadcasters’ transition to a new television broadcast standard, but it raises numerous complicated technical, legal and practical issues. The draft NPRM seeks comment on many of the issues that cable operators will face if a television licensee can opt to broadcast both an ATSC 1.0 and an ATSC 3.0 signal from two different transmitter locations.

NCTA proposed that the NPRM include additional questions designed to ensure that a broadcaster’s decision to transmit an ATSC 3.0 signal does not require cable operators to incur additional costs or to reopen agreements to continue to provide broadcast stations to their customers. For example, NCTA proposed that the NPRM expand its discussion of simulcasting issues that will arise during the lengthy transition period when broadcasters will be transmitting both ATSC 1.0 and ATSC 3.0 signals to ensure that broadcasters continue to provide a high definition signal over the air on their ATSC 1.0 signal and continue to provide a good quality signal to the cable system headend.

Respectfully submitted,

/s/ Rick Chessen

Rick Chessen

cc: Alison Nemeth
David Grossman
Robin Colwell